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11 Lilith Games (Shanghai) Co. Ltd.

12 UNITED STATES DISTRICT COURT
13
14 NORTHERN DISTRICT OF CALIFORNIA
15
16 SAN FRANCISCO DIVISION

17 Lilith Games (Shanghai) Co. Ltd.,
18 Plaintiff,
19 v.
20 uCool, Inc. and uCool Ltd.,
21 Defendants.

Case No. 15-cv-01267-SC

DECLARATION OF JI XIAIOJUN

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2 1. My name is Ji Xiaojun, and I am over the age of twenty-one (21) years, of sound
3 mind, and fully competent to testify in this cause.

4 2. I am the Legal Manager for Lilith Games (Shanghai) Co. Ltd. ("Lilith"). I am
5 familiar with Lilith's policy and efforts to maintain as strictly confidential the source code written in
6 the programming language Lua that is embodied in Lilith's game Dao Ta Chuan Qi in Chinese
7 (literally meaning "the legend of sword and tower") ("Sword and Tower"). As a result, I have
8 personal knowledge that all facts set forth in this declaration are true and correct.
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10 3. I have reviewed uCool, Inc.'s ("uCool") Administrative Motion to File Under Seal
11 Portions of its Opposition to Plaintiff's Motion for Preliminary Injunction. I understand that uCool
12 has filed Lilith's Lua source code with the Court which Lilith has designated as HIGHLY
13 CONFIDENTIAL – SOURCE CODE, in accordance with the parties' agreement that such code is
14 to, among other things, to be strictly maintained as OUTSIDE COUNSEL'S EYES ONLY. In
15 particular, I understand that uCool filed a motion seeking to file under seal Lilith's Lua Source Code
16 that is contained in the following documents:
17

Document	Portions to be filed under seal
Garry Kitchen's Declaration	Highlighted portion of paragraph 86; the entirety of paragraph 85.
The declaration of Michael LaFond	Exhibits B, C, and D in their entirety.

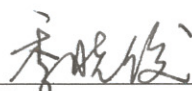
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23 4. The parties agreed that, to the extent any of Lilith's Lua source code was filed with
24 the Court, including the source code reflected in the documents referenced in ¶ 2 above, the source
25 code would be filed under seal with the Court. Indeed, Lilith considers its Lua source code to be
26 confidential, proprietary, trade-secret information, that is not to be disclosed to third parties. Indeed,
27 but for this lawsuit and uCool's agreement to maintain the Lua source code as strictly confidential,
28 outside attorney's eyes only, Lilith would not have disclosed that source code to uCool's counsel.

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To prevent the harm that would result to Lilith's business if its code were made publicly available,
Lilith supports uCool's motion to have that code field under seal with the Court.

Under the laws of the United States, I declare under the penalty of perjury that the foregoing
is true and correct.

Dated August 3, 2015



Ji Xiaojun
Lilith Games (Shanghai) Co., Ltd.